

Tuesday, February 18, 2014

Via PDF (Moody.jonathan@EPA.gov)
Confirmation First Class Mail

U.S. Environmental Protection Agency
Attention: Jonathan Moody
Water Enforcement & Compliance Assurance Branch
Water Division, WC-15J
77 West Jackson Blvd.
Chicago, IL 60604-3590

**RE: January 2014 Monthly Discharge Report Pursuant to Paragraph 10 of
July 2, 2013 Clean Water Act Section 308(a) Request for Information
Eagle Mine, LLC, Humboldt Mill Facility
Docket No. V-W-13-308-17**

Dear Mr. Moody:

In accordance with Region 5 U.S. EPA's Clean Water Act Section 308(a) Information Request dated July 2, 2013 (Request) and subsequent correspondence between Regional Counsel Nicole Cantello and Dennis J. Donohue, Eagle Mine LLC (Eagle) hereby submits this monthly report of discharge of water from the Humboldt Tailings Disposal Facility (HTDF) in partial response to paragraph No. 10 of the Request, for the period from January 1 to January 31, 2014.

The enclosed tabular summary (Table 1) contains dates of water discharge from the HTDF, the total estimated volume of discharge and the peak rate of discharge. Because flow rates are measured or estimated on a daily basis, the peak rate of discharge is presented as a daily maximum flow.

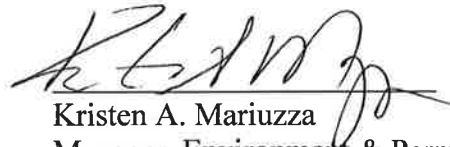
Analytical results from January 9, 2014 sampling of the HTDF discharge are also summarized in Table 1. The January 9, 2014 sampling event represents a dry weather sampling event. A qualifying rainfall event did not occur in January of 2014. The laboratory analytical reports for the HTDF discharge samples, including relevant chain of custody documentation, are presented as Attachment I to this letter.

The HTDF discharge analytical results were compared to Michigan Rule 57 water quality standards. With the exception of mercury, no other exceedances of Rule 57 water quality standards were observed in the surface water discharge samples. Mercury results have fluctuated since sampling was initiated in July 2013, and the January result was just above the most stringent Rule 57 water quality criterion for that parameter, and the concentration of mercury observed in this sample is not inconsistent with storm water discharge.

Finally, we are also submitting surface water elevation data for the HTDF collected in January of 2014, as requested by Nicole Cantello in her September 3, 2013 electronic correspondence to Dennis Donohue. Water elevation readings collected through January 13th were measured in a piezometer installed in close proximity to the HTDF. For the remainder of January, water elevations were determined using a staff gage located on the north end of the HTDF. A hole is being maintained through the HTDF surface ice, adjacent to the staff gage, where water level measurements are taken.

Please do not hesitate to contact me with any questions regarding these documents or if you are in need of additional information.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A handwritten signature in dark ink, appearing to read 'K. Mariuzza', is written over a horizontal line.

Kristen A. Mariuzza
Manager, Environment & Permitting

**HUMBOLDT TAILINGS DISPOSAL FACILITY
STORM WATER DISCHARGE
FLOW DATA**

| Discharge Date | Estimated Daily Discharge (gal) ¹ | Notes |
|---|--|-------|
| 1/1/2014 | 1,152,000 | |
| 1/2/2014 | 1,152,000 | |
| 1/3/2014 | 1,152,000 | |
| 1/4/2014 | 1,152,000 | |
| 1/5/2014 | 1,152,000 | |
| 1/6/2014 | 1,152,000 | |
| 1/7/2014 | 1,152,000 | |
| 1/8/2014 | 1,152,000 | |
| 1/9/2014 | 1,152,000 | |
| 1/10/2014 | 1,152,000 | |
| 1/11/2014 | 1,152,000 | |
| 1/12/2014 | 1,152,000 | |
| 1/13/2014 | 1,152,000 | |
| 1/14/2014 | 1,152,000 | |
| 1/15/2014 | 1,152,000 | |
| 1/16/2014 | 1,152,000 | |
| 1/17/2014 | 1,152,000 | |
| 1/18/2014 | 1,152,000 | |
| 1/19/2014 | 1,152,000 | |
| 1/20/2014 | 1,152,000 | |
| 1/21/2014 | 1,152,000 | |
| 1/22/2014 | 1,436,800 | |
| 1/23/2014 | 1,554,200 | |
| 1/24/2014 | 1,583,200 | |
| 1/25/2014 | 1,503,700 | |
| 1/26/2014 | 1,623,350 | |
| 1/27/2014 | 1,623,350 | |
| 1/28/2014 | 1,152,000 | |
| 1/29/2014 | 1,152,000 | |
| 1/30/2014 | 1,152,000 | |
| 1/31/2014 | 1,152,000 | |
| | | |
| Total Estimated Monthly Discharge (gal): | 38,124,600 | |
| Maximum Estimated Daily Discharge Rate (gal): | 1,623,350 | |

¹ Discharge rates are estimated based, in part, on pump capacity and pump operating time.

EPA Section 308(a) Information Request

Docket No. V-W-13-308-17

Eagle Mine, LLC, Humboldt Mill Facility, Champion, MI

Request No. 10

January 2014 Monthly Report

**HUMBOLDT TAILINGS DISPOSAL FACILITY
STORM WATER DISCHARGE
DISCHARGE CHARACTERIZATION DATA**

| | | |
|-----------------------------|---------------------|-------------|
| Sample Location | | EM-HMP-009 |
| Lab Sample ID | | T14A091-01 |
| Sampled By | | AECOM |
| Analyzed By | | Trace |
| Sample Date | | 1/9/2014 |
| <i>Inorganics</i> | <i>Units</i> | |
| Antimony | ug/L | 5.7 |
| Arsenic | ug/L | <1.0 |
| Barium | ug/L | 9.0 |
| Beryllium | ug/L | <1.0 |
| Boron | ug/L | 83 |
| Cadmium | ug/L | <0.20 |
| Chromium, Total | ug/L | <10 |
| Cobalt | ug/L | 2.9 |
| Copper | ug/L | 1.7 |
| Lead | ug/L | <1.0 |
| Lithium | ug/L | <10 |
| Manganese | ug/L | 180 |
| Mercury (Inorganic) | ng/L | 1.4 |
| Molybdenum | ug/L | 11 |
| Nickel | ug/L | 14 |
| Selenium | ug/L | <1.0 |
| Silver | ug/L | <0.5 |
| Strontium | ug/L | 220 |
| Thallium | ug/L | <1.0 |
| Zinc | ug/L | <10 |
| <i>Miscellaneous</i> | <i>Units</i> | |
| Cyanide, total | mg/L | <0.0050 |
| Fluoride | mg/L | 0.25 |
| Nitrogen, Ammonia | mg/L | <0.010 |
| Phosphorus, Total | mg/L | <0.010 |
| Sulfate | mg/L | 140 |
| Total Dissolved Solids | mg/L | 360 |
| Total Suspended Solids | mg/L | <10 |

Bolded value denotes parameter detected above detection limit

N - A positive result for this analyte was found in the method blank. Because the concentration in the blank was greater than 5% of the sample concentration, the sample result must be considered estimated.

--- Parameter not analyzed in sample

HUMBOLDT TAILINGS DISPOSAL FACILITY ("HTDF")
SURFACE WATER ELEVATION DATA

| Measurement Date | HTDF Water Elevation (ft AMSL) |
|------------------|-----------------------------------|
| | |
| 1/2/2014 | 1537.57 |
| 1/9/2014 | 1537.53 |
| 1/13/2014 | 1537.50 |
| 1/16/2014 | 1536.89 |
| 1/17/2014 | 1536.87 |
| 1/20/2014 | 1536.79 |
| 1/21/2014 | 1536.77 |
| 1/22/2014 | 1536.73 |
| 1/23/2014 | 1536.71 |
| 1/24/2014 | 1536.67 |
| 1/30/2014 | 1536.37 |

February 04, 2014

Mr. Lance Lindberg
AECOM
1050 Wilson
Marquette, MI 49855

Phone: (906) 228-2333

Fax: (906) 226-8371

RE: Trace Project T14A091
Client Project Humbolt Mill / 60305471

Dear Mr. Lindberg:

Enclosed are your analytical results. The results of this report relate only to the samples listed in the body of this report.

All reports were examined through Trace's validation process to ensure that requirements for quality and completeness were satisfied. All reported analytical results were obtained in accordance with the methods referenced on the reports. Every practical effort was made to meet the reporting limit specifications for this work, however, some results may have raised reporting limits to correct for percent solids.

For clients that require NELAC Accreditation, Trace certifies that these test results meet all requirements of the NELAC Standard, except for those analytes with a "N" notation. These analytes have not been evaluated by NELAC at Trace's discretion and will not be reported unless requested by client.

If you have questions concerning this report, please contact me at 231.773.5998 or by email at jmink@trace-labs.com.

Sincerely,



Jon Mink
Senior Project Manager
Enclosures



NJDEP Accreditation No. MI008 PADEP Accreditation No. 68-04471

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SAMPLE SUMMARY

Trace Project ID: T14A091
Client Project ID: Humbolt Mill / 60305471

| Trace ID | Sample ID | Matrix | Collected By | Date Collected | Date Received |
|------------|------------|---------|--------------|----------------|----------------|
| T14A091-01 | EM-HMP-009 | Aqueous | ajp | 01/09/14 09:45 | 01/10/14 11:28 |

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AN EXPLANATION OF TERMS AND SYMBOLS WHICH MAY OCCUR IN THIS REPORT

DEFINITIONS

| | |
|------------|--|
| LCS | Laboratory Control Sample |
| LCSD | Laboratory Control Sample Duplicate |
| MS | Matrix Spike |
| MSD | Matrix Spike Duplicate |
| RPD | Relative Percent Difference |
| DUP | Matrix Duplicate |
| RDL | Reporting Detection Limit |
| MCL | Maximum Contamination Limit |
| TIC | Tentatively Identified Compound |
| <, ND or U | Indicates the compound was analyzed for but not detected |
| * | Indicates a result that exceeds its associated MCL or Surrogate control limits |
| N | Indicates that the compound has not been evaluated by NELAC |
| NA | Indicates that the compound is not available. |

DATA QUALIFIERS

Trace ID: T042499-BS1

Analysis: EPA 200.8 Rev. 5.4

| | |
|-----------------|---|
| Cadmium | Note 112 : The LCS recovery was out of control high. Because there were no positive results for this analyte in this QC batch, no data require qualification. |
| Thallium | Note 112 : The LCS recovery was out of control high. Because there were no positive results for this analyte in this QC batch, no data require qualification. |

Trace ID: T042696-MS1

Analysis: SM 4500-P E

| | |
|--------------------------------|--|
| Phosphorus-Total (as P) | Note 230 : The MS and MSD were out of control high. Because there was no positive result in the non-spiked version of the sample, no data require qualification. |
|--------------------------------|--|

Trace ID: T042696-MSD1

Analysis: SM 4500-P E

| | |
|--------------------------------|--|
| Phosphorus-Total (as P) | Note 230 : The MS and MSD were out of control high. Because there was no positive result in the non-spiked version of the sample, no data require qualification. |
|--------------------------------|--|

Trace ID: T14A091-01

Analysis: SM 4500-H+ B-00

| | |
|-----------|--|
| pH | Note 511 : The sample was received and, therefore, analyzed beyond the established EPA hold time. The result must be considered estimated. |
| pH | Note pH : The pH was analyzed at 11:34 |

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ANALYTICAL RESULTS

Trace Project ID: T14A091
Client Project ID: Humbolt Mill / 60305471

Trace ID: T14A091-01 Date Collected: 01/09/14 09:45 Matrix: Aqueous
Sample ID: EM-HMP-009 Date Received: 01/10/14 11:28

| PARAMETERS | RESULTS UNITS | RDL | DILUTION | PREPARED | BY | ANALYZED | BY | NOTES | MCL |
|------------|---------------|-----|----------|----------|----|----------|----|-------|-----|
|------------|---------------|-----|----------|----------|----|----------|----|-------|-----|

METALS, TOTAL

Analysis Method: EPA 1631E

Batch: T042493

| | | | | | | | | | |
|---------|----------|------|---|----------|-----|----------|-----|--|--|
| Mercury | 1.4 ng/L | 0.50 | 1 | 01/10/14 | klm | 01/15/14 | klm | | |
|---------|----------|------|---|----------|-----|----------|-----|--|--|

Analysis Method: EPA 200.7 Rev. 4.4

Batch: T042499

| | | | | | | | | | |
|-----------|----------|----|---|----------|-----|----------|-----|---|--|
| Boron | 83 ug/L | 40 | 1 | 01/13/14 | rlb | 01/13/14 | dtm | | |
| Lithium | <10 ug/L | 10 | 1 | 01/13/14 | rlb | 01/13/14 | dtm | N | |
| Strontium | 220 ug/L | 50 | 1 | 01/13/14 | rlb | 01/13/14 | dtm | | |

Analysis Method: EPA 200.8 Rev. 5.4

Batch: T042499

| | | | | | | | | | |
|------------|------------|------|---|----------|-----|----------|-----|---|--|
| Antimony | 5.7 ug/L | 1.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Arsenic | <1.0 ug/L | 1.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Barium | 9.0 ug/L | 5.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Beryllium | <1.0 ug/L | 1.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Cadmium | <0.20 ug/L | 0.20 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Chromium | <10 ug/L | 10 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Cobalt | 2.9 ug/L | 2.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Copper | 1.7 ug/L | 1.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Lead | <1.0 ug/L | 1.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Manganese | 180 ug/L | 1.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Molybdenum | 11 ug/L | 1.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | N | |
| Nickel | 14 ug/L | 5.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Selenium | <1.0 ug/L | 1.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Silver | <0.50 ug/L | 0.50 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Thallium | <1.0 ug/L | 1.0 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |
| Zinc | <10 ug/L | 10 | 1 | 01/13/14 | rlb | 01/16/14 | klm | | |

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ANALYTICAL RESULTS

Trace Project ID: T14A091
Client Project ID: Humbolt Mill / 60305471

Trace ID: T14A091-01 Date Collected: 01/09/14 09:45 Matrix: Aqueous
Sample ID: EM-HMP-009 Date Received: 01/10/14 11:28

| PARAMETERS | RESULTS UNITS | RDL | DILUTION | PREPARED | BY | ANALYZED | BY | NOTES | MCL |
|------------|---------------|-----|----------|----------|----|----------|----|-------|-----|
|------------|---------------|-----|----------|----------|----|----------|----|-------|-----|

WET CHEMISTRY

Analysis Method: ASTM D7511-09e2

Batch: T042568

| | | | | | | | | | |
|-----------------|--------------|--------|---|----------|----|----------|----|--|--|
| Cyanide (total) | <0.0050 mg/L | 0.0050 | 1 | 01/15/14 | sv | 01/15/14 | sv | | |
|-----------------|--------------|--------|---|----------|----|----------|----|--|--|

Analysis Method: EPA 300.0 Rev. 2.1

Batch: T042515

| | | | | | | | | | |
|----------|-----------|------|---|----------|----|----------|----|--|--|
| Fluoride | 0.25 mg/L | 0.10 | 5 | 01/13/14 | sv | 01/14/14 | sv | | |
|----------|-----------|------|---|----------|----|----------|----|--|--|

| | | | | | | | | | |
|----------------------------|----------|-----|----|----------|----|----------|----|--|--|
| Sulfate as SO ₄ | 140 mg/L | 5.0 | 10 | 01/13/14 | sv | 01/14/14 | sv | | |
|----------------------------|----------|-----|----|----------|----|----------|----|--|--|

Analysis Method: EPA 350.1 Rev. 2.0

Batch: T042534

| | | | | | | | | | |
|--------------|-------------|-------|---|----------|----|----------|----|--|--|
| Ammonia as N | <0.010 mg/L | 0.010 | 1 | 01/14/14 | as | 01/17/14 | as | | |
|--------------|-------------|-------|---|----------|----|----------|----|--|--|

Analysis Method: SM 2540 C-97

Batch: T042511

| | | | | | | | | | |
|------------------------|----------|----|---|----------|----|----------|----|--|--|
| Total Dissolved Solids | 360 mg/L | 10 | 1 | 01/13/14 | sv | 01/13/14 | sv | | |
|------------------------|----------|----|---|----------|----|----------|----|--|--|

Analysis Method: SM 2540 D-97

Batch: T042500

| | | | | | | | | | |
|------------------------|----------|----|---|----------|----|----------|----|--|--|
| Total Suspended Solids | <10 mg/L | 10 | 1 | 01/13/14 | sv | 01/13/14 | sv | | |
|------------------------|----------|----|---|----------|----|----------|----|--|--|

Analysis Method: SM 4500-H+ B-00

Batch: T042554

| | | | | | | | | | |
|----|---------------|--|---|----------|-----|----------|-----|---------|--|
| pH | 7.73 pH Units | | 1 | 01/10/14 | jrw | 01/10/14 | jrw | 511, pH | |
|----|---------------|--|---|----------|-----|----------|-----|---------|--|

Analysis Method: SM 4500-O C-01

Batch: T042494

| | | | | | | | | | |
|------------------|---------|-------|---|----------|----|----------|----|---|--|
| Dissolved Oxygen | 14 mg/L | 0.080 | 1 | 01/10/14 | sv | 01/10/14 | sv | N | |
|------------------|---------|-------|---|----------|----|----------|----|---|--|

Analysis Method: SM 4500-P E

Batch: T042696

| | | | | | | | | | |
|-------------------------|-------------|-------|---|----------|----|----------|----|---|--|
| Phosphorus-Total (as P) | <0.010 mg/L | 0.010 | 1 | 01/21/14 | sv | 01/22/14 | sv | N | |
|-------------------------|-------------|-------|---|----------|----|----------|----|---|--|

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QUALITY CONTROL RESULTS

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042493

Analysis Description: Mercury, Total, Low Level

QC Batch Method: EPA 1631E

Analysis Method: EPA 1631E

METHOD BLANK: T042493-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|-----------|-------|--------------|-----------------|-------|
| Mercury | ng/L | <0.50 | 0.50 | |

LABORATORY CONTROL SAMPLE: T042493-BS1

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limit | Notes |
|-----------|-------|-------------|------------|-----------|-------------|-------|
| Mercury | ng/L | 25.0 | 23.9 | 96 | 77-123 | |

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042499

Analysis Description: Strontium, Total

QC Batch Method: EPA 200.2

Analysis Method: EPA 200.7 Rev. 4.4

METHOD BLANK: T042499-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|-----------|-------|--------------|-----------------|-------|
| Boron | ug/L | <40 | 40 | |
| Lithium | ug/L | <100 | 100 | |
| Strontium | ug/L | <1000 | 1000 | |

LABORATORY CONTROL SAMPLE: T042499-BS1

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limit | Notes |
|-----------|-------|-------------|------------|-----------|-------------|-------|
| Boron | ug/L | 1600 | 1490 | 93 | 85-115 | |
| Strontium | ug/L | 1600 | 1640 | 102 | 85-115 | |

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042499

Analysis Description: Beryllium, Total

QC Batch Method: EPA 200.2

Analysis Method: EPA 200.8 Rev. 5.4

METHOD BLANK: T042499-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|-----------|-------|--------------|-----------------|-------|
| Silver | ug/L | <0.50 | 0.50 | |
| Arsenic | ug/L | <1.0 | 1.0 | |
| Barium | ug/L | <5.0 | 5.0 | |

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METHOD BLANK: T042499-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|------------|-------|--------------|-----------------|-------|
| Beryllium | ug/L | <1.0 | 1.0 | |
| Cadmium | ug/L | <0.20 | 0.20 | |
| Cobalt | ug/L | <2.0 | 2.0 | |
| Chromium | ug/L | <10 | 10 | |
| Copper | ug/L | <1.0 | 1.0 | |
| Manganese | ug/L | <1.0 | 1.0 | |
| Molybdenum | ug/L | <1.0 | 1.0 | |
| Nickel | ug/L | <5.0 | 5.0 | |
| Lead | ug/L | <1.0 | 1.0 | |
| Antimony | ug/L | <1.0 | 1.0 | |
| Selenium | ug/L | <1.0 | 1.0 | |
| Thallium | ug/L | <1.0 | 1.0 | |
| Zinc | ug/L | <10 | 10 | |

LABORATORY CONTROL SAMPLE: T042499-BS1

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limit | Notes |
|-----------------|-------------|-------------|-------------|------------|---------------|------------|
| Silver | ug/L | 20.0 | 21.3 | 106 | 85-115 | |
| Arsenic | ug/L | 100 | 108 | 108 | 85-115 | |
| Barium | ug/L | 1600 | 1790 | 112 | 85-115 | |
| Beryllium | ug/L | 200 | 218 | 109 | 85-115 | |
| Cadmium | ug/L | 50.0 | 57.8 | 116 | 85-115 | 112 |
| Cobalt | ug/L | 1600 | 1790 | 112 | 85-115 | |
| Chromium | ug/L | 50.0 | 56.0 | 112 | 85-115 | |
| Copper | ug/L | 1600 | 1800 | 113 | 85-115 | |
| Manganese | ug/L | 1600 | 1770 | 111 | 85-115 | |
| Molybdenum | ug/L | 1600 | 1760 | 110 | 85-115 | |
| Nickel | ug/L | 1600 | 1820 | 114 | 85-115 | |
| Lead | ug/L | 100 | 113 | 113 | 85-115 | |
| Antimony | ug/L | 100 | 114 | 114 | 85-115 | |
| Selenium | ug/L | 100 | 111 | 111 | 85-115 | |
| Thallium | ug/L | 100 | 116 | 116 | 85-115 | 112 |
| Zinc | ug/L | 1600 | 1790 | 112 | 85-115 | |

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042568

Analysis Description: Cyanide, Total

QC Batch Method: ASTM D7511-09e2

Analysis Method: ASTM D7511-09e2

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METHOD BLANK: T042568-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|-----------------|-------|--------------|-----------------|-------|
| Cyanide (total) | mg/L | <0.0050 | 0.0050 | |

LABORATORY CONTROL SAMPLE: T042568-BS1

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limit | Notes |
|-----------------|-------|-------------|------------|-----------|-------------|-------|
| Cyanide (total) | mg/L | 0.100 | 0.0979 | 98 | 90-110 | |

SAMPLE DUPLICATE: T042568-DUP1

Original: T14A091-01

| Parameter | Units | Original Result | DUP Result | RPD | Max RPD | Notes |
|-----------------|-------|-----------------|------------|-----|---------|-------|
| Cyanide (total) | mg/L | 0.00401 | 0.00459 | 13 | 200 | |

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042515

QC Batch Method: IC Prep W

Analysis Description: Fluoride

Analysis Method: EPA 300.0 Rev. 2.1

METHOD BLANK: T042515-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|-----------|-------|--------------|-----------------|-------|
| Fluoride | mg/L | <0.10 | 0.10 | |

LABORATORY CONTROL SAMPLE: T042515-BS1

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limit | Notes |
|-----------|-------|-------------|------------|-----------|-------------|-------|
| Fluoride | mg/L | 0.500 | 0.491 | 98 | 90-110 | |

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042521

QC Batch Method: IC Prep W

Analysis Description: Sulfate

Analysis Method: EPA 300.0 Rev. 2.1

METHOD BLANK: T042521-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|----------------|-------|--------------|-----------------|-------|
| Sulfate as SO4 | mg/L | <2.5 | 2.5 | |

LABORATORY CONTROL SAMPLE: T042521-BS1

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limit | Notes |
|----------------|-------|-------------|------------|-----------|-------------|-------|
| Sulfate as SO4 | mg/L | 2.50 | 2.69 | 108 | 90-110 | |

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Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042534

Analysis Description: Nitrogen, Ammonia

QC Batch Method: EPA 350.1 Rev. 2.0

Analysis Method: EPA 350.1 Rev. 2.0

METHOD BLANK: T042534-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|--------------|-------|--------------|-----------------|-------|
| Ammonia as N | mg/L | <0.010 | 0.010 | |

LABORATORY CONTROL SAMPLE: T042534-BS1

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limit | Notes |
|--------------|-------|-------------|------------|-----------|-------------|-------|
| Ammonia as N | mg/L | 0.500 | 0.457 | 91 | 90-110 | |

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042511

Analysis Description: Total Dissolved Solids

QC Batch Method: SM 2540 C-97

Analysis Method: SM 2540 C-97

METHOD BLANK: T042511-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|------------------------|-------|--------------|-----------------|-------|
| Total Dissolved Solids | mg/L | <10 | 10 | |

LABORATORY CONTROL SAMPLE: T042511-BS1

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limit | Notes |
|------------------------|-------|-------------|------------|-----------|-------------|-------|
| Total Dissolved Solids | mg/L | 500 | 508 | 102 | 80-120 | |

SAMPLE DUPLICATE: T042511-DUP1

Original: T14A091-01

| Parameter | Units | Original Result | DUP Result | RPD | Max RPD | Notes |
|------------------------|-------|-----------------|------------|-----|---------|-------|
| Total Dissolved Solids | mg/L | 358 | 354 | 1 | 10 | |

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042500

Analysis Description: Total Suspended Solids

QC Batch Method: SM 2540 D-97

Analysis Method: SM 2540 D-97

METHOD BLANK: T042500-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|------------------------|-------|--------------|-----------------|-------|
| Total Suspended Solids | mg/L | <10 | 10 | |

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LABORATORY CONTROL SAMPLE: T042500-BS1

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limit | Notes |
|------------------------|-------|-------------|------------|-----------|-------------|-------|
| Total Suspended Solids | mg/L | 50.0 | 46.0 | 92 | 85-115 | |

SAMPLE DUPLICATE: T042500-DUP1

Original: T14A091-01

| Parameter | Units | Original Result | DUP Result | RPD | Max RPD | Notes |
|------------------------|-------|-----------------|------------|-----|---------|-------|
| Total Suspended Solids | mg/L | 0.00 | <10 | | 10 | |

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042554

Analysis Description: pH, SM 4500

QC Batch Method: *** DEFAULT PREP ***

Analysis Method: SM 4500-H+ B-00

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042494

Analysis Description: Dissolved Oxygen

QC Batch Method: SM 4500-O C-01

Analysis Method: SM 4500-O C-01

Trace Project ID: T14A091

Client Project ID: Humbolt Mill / 60305471

QC Batch: T042696

Analysis Description: Total Phosphorus

QC Batch Method: SM 4500-P E

Analysis Method: SM 4500-P E

METHOD BLANK: T042696-BLK1

| Parameter | Units | Blank Result | Reporting Limit | Notes |
|-------------------------|-------|--------------|-----------------|-------|
| Phosphorus-Total (as P) | mg/L | <0.010 | 0.010 | |

LABORATORY CONTROL SAMPLE: T042696-BS1

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limit | Notes |
|-------------------------|-------|-------------|------------|-----------|-------------|-------|
| Phosphorus-Total (as P) | mg/L | 0.100 | 0.0952 | 95 | 85-116 | |

MATRIX SPIKE / MATRIX SPIKE DUPLICATE: T042696-MSD1

Original: T14A091-01

| Parameter | Units | Original Result | Spike Conc. | MS Result | MSD Result | MS % Rec | MSD % Rec | % Rec Limit | RPD | Max RPD | Notes |
|-------------------------|-------|-----------------|-------------|-----------|------------|----------|-----------|-------------|-----|---------|-------|
| Phosphorus-Total (as P) | mg/L | 0 | 0.100 | 0.131 | 0.125 | 131 | 125 | 84-112 | 4 | 7 | 230 |

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CHAIN-OF-CUSTODY RECORD

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Page 1 of 1

TRACE ID NO.

T14A091

| | | | | | | | |
|--|--|---|--|---|--|---|--|
| Report Results To: | | Client Name: <u>AECOM</u> | | Logged By: <u>DMC</u> | | Checked By: <u>YMB</u> | |
| | | Contact Person: <u>Lance Lindberg</u> | | Received on ico: <u>Yes</u> No | | Preservative Checked: <u>Yes</u> No N/A | |
| | | Mailing Address: <u>1050 W. Con St.</u> | | Soil Volatiles Preserved: MeOH Low Level Lab Sampling Time: | | | |
| | | City, State, Zip Code: <u>Marquette, MI 49855</u> | | | | | |
| Phone: <u>906.226.4980</u> | | Fax: <u>906.226.8271</u> | | Regulatory Requirements | | | |
| Email Address: <u>lance.lindberg@aecom.com</u> | | Coll #: <u> </u> | | Sampled by: <u>AJP</u> | | Turnaround Requirements | |
| Project Name & #: <u>Humboldt Mill / 62305471</u> | | Billing Address (if different): <u>same</u> | | City, State, Zip Code: <u> </u> | | Matrix Key | |
| Attn: <u> </u> Phone: <u> </u> PO #: <u> </u> | | TRACE NO. <u>01</u> | | DATE TAKEN <u>1-9-14</u> | | TIME TAKEN <u>0845</u> | |
| Request for Analytical Services | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| CLIENT SAMPLE ID | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| MATRIX | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| NUMBER OF CONTAINERS | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| REMARKS | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| Possible Health Hazard | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| Total Pb, Cd, Cr, Cu, Fe, Hg, Mn, Ni, Se, Tg, Sr, Ti, Zn | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| Total Cyanide | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| Total VLL Hg | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| Total Sulfate | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| Total Phosphate | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| Ammonia Nitrogen | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| DO & pH | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| Please Sign | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| Item # | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| RELEASED BY | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| RECEIVED BY | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| DATE | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| TIME | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| Item # | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| RELEASED BY | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| RECEIVED BY | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| DATE | | DATE TAKEN | | TIME TAKEN | | METALS FED | |
| TIME | | DATE TAKEN | | TIME TAKEN | | METALS FED | |

In executing this Chain of Custody, the client acknowledges acceptance of the terms and conditions of the agreement as set forth at <http://www.trace-labs.com/cocterm.php>

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SAMPLE LOG IN CHECKLIST

| | | |
|----------------------------|-----------------------|------------------------------------|
| Trace ID #: <u>T14A091</u> | Date: <u>11/10/14</u> | Package Description: <u>Cooler</u> |
| Client Name: <u>AECOM</u> | Time: <u>11:28</u> | Logged in by: <u>PMK</u> |

Cooler Receipt

| | | | | | | |
|---|---|--|---|---|---------------------------------|----------------------------------|
| Cooler/samples delivered by: | Trace courier <input type="checkbox"/> | Hand delivered <input type="checkbox"/> | Commercial courier <input type="checkbox"/> | UPS <input checked="" type="checkbox"/> | FED EX <input type="checkbox"/> | US Mail <input type="checkbox"/> |
| Name of delivery person: _____ | | | | | | |
| Tracking Number: | <input type="checkbox"/> Not Applicable | | | | | |
| Tracking #: | <u>1Z RH103401 9711 2007</u> | | | | | |
| COC Seals present and intact on cooler? | No <input type="checkbox"/> | <input type="checkbox"/> Not Applicable | | | | |
| | Yes <input checked="" type="checkbox"/> | | | | | |
| Custody seals signed by Client? | No <input type="checkbox"/> | Client custody seal # (if applicab/e): _____ | | | | |
| | Yes <input checked="" type="checkbox"/> | | | | | |

Coolant and Temperature

Type of Coolant Used

| | |
|--|-------------------------------------|
| Slurry w/ crushed, cubed, or chip ice? | <input type="checkbox"/> |
| Multiple bags of ice around samples? | <input checked="" type="checkbox"/> |
| Ice Packs/ Blue Ice: | <input type="checkbox"/> |
| No Coolant Present: | <input type="checkbox"/> |

Cooler Temperature

| | |
|---------------------------------|---|
| Correction Factor: | IR Thermometer <u>+0.2</u> °C |
| | Digital Stick Thermometer <u>-0.1</u> °C |
| Temperature Blank: | <u>NONE</u> °C (Use Digital Stick Thermometer) |
| Range of 3 samples: | <u>1-2</u> °C (Use IR Thermometer) |
| Melt Water: | _____ °C (IR or Stick Therm. - circle one) |
| Ice still present upon receipt: | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

General

| | Yes | No | NA | Comments |
|---|-------------------------------------|--------------------------|-------------------------------------|------------|
| All bottles arrived unbroken with labels in good condition? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Each sample point is in a sealed plastic bag? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Labels filled out completely? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| All bottle labels agree with Chain of Custody (COC)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Sufficient sample to run tests requested? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| pH checked and samples at correct pH? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | See Below* |
| Correct preservative added to samples? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Air bubbles absent from VOAs? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| COC filled out properly and signed by client? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| COC signed in by TRACE sample custodian? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was project manager called and samples discussed? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

Notes: _____

*EMD pH Test Strips Used:

| | |
|---|--|
| <input type="checkbox"/> pH 0-2.5 Lot: IHC376384 | <input type="checkbox"/> pH 11.0-13.0 Lot: HC949254 |
| <input type="checkbox"/> Other: _____ | |

Form 70-A.10
Effective 8/26/13

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